

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NEW ENGLAND CARPENTERS)	
HEALTH AND WELFARE FUND,)	
)	No. 1:12-cv-01662
Plaintiff,)	
)	Judge Robert M. Dow, Jr.
v.)	
)	
ABBOTT LABORATORIES,)	
)	
Defendant.)	

AGREED MOTION FOR EXTENSION OF TIME

Defendant Abbott Laboratories, by its attorneys, and pursuant to Fed. R. Civ. P. 6(b)(1), respectfully requests that the Court grant Defendant an extension to and including June 4, 2012, to move, answer, or otherwise respond to the Complaint. In support of its Motion, Defendant states as follows:

1. Plaintiff filed a Complaint on March 7, 2012.
2. Defendant presently has until April 4, 2012 to move, answer, or otherwise respond to the Complaint.
3. Defendant Abbott Laboratories is continuing its investigation of the claims alleged in the Complaint, and therefore requests an extension of the deadline for it to move, answer, or otherwise respond to the Complaint. This is the first request for an extension of this deadline. Plaintiff does not oppose this request.
4. This request is being made in good faith and will not cause undue delay or prejudice to any party.

WHEREFORE, for the foregoing reasons, Defendant Abbott Laboratories respectfully requests that the Court enter an Order granting Defendant an extension of time, to and including June 4, 2012, to move, answer or otherwise respond to the Complaint.

Respectfully submitted,

ABBOTT LABORATORIES

By: /s/ Samantha L. Maxfield

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CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2012 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following persons at the given e-mail addresses:

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On the same date, I caused a true and correct copy of the foregoing motion to be sent to the following individuals via U.S. Mail:

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